

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 02-10067-NG
)
 JOHN HANDY)

ASSENTED-TO MOTION TO ENLARGE TIME FOR FILING RESPONSE TO THE
COURT'S REQUEST FOR BRIEFING

The Court's August 1, 2006 Order in this case requested briefing of the issues arising from the government's prosecution of defendant after his plea and sentence in Brockton District Court and set a filing deadline of August 14, 2006 for the parties' responses. Defendant requests that the Court extend the date for filing to August 16, 2006. As reasons therefore, counsel for defendant states that on the day of the filing deadline he was required to travel to Springfield on an emergency matter arising out of case before Judge Ponsor. Counsel was therefore unable to complete defendant's response by the close of business as ordered. The delay in filing caused by this emergency will be compounded by other matters requiring counsel's immediate attention on August 15, 2006. Counsel therefore requests that defendant be allowed to file his response by August 16, 2006.

The government assents to this motion.¹

¹Defendant notes that the Court's intent was that the briefs be filed simultaneously. Defendant obtained the assent of the government with the explicit understanding that both parties could benefit from the extension. The government has, nevertheless, already filed its response. See Docket Entry No. 31.

By his attorney,

/s/ Timothy G. Watkins
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CERTIFICATE OF SERVICE

I, Timothy G. Watkins, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on August 15, 2006.

/s/ Timothy G. Watkins
Timothy G. Watkins